

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**BCS SOFTWARE, LLC,**

**Plaintiff**

**v.**

**ZOHO CORPORATION**

**Defendant.**

**Case No. 6:21-cv-0051-ADA**

**JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff BCS Software, LLC (“BCS”) and Defendant Zoho Corporation (“Zoho”) respectfully submit this Joint Claim Construction Statement for the asserted claims of U.S. Patent No. 8,819,120 (“the ‘120 Patent”).

**I. DISPUTED CLAIM TERMS****A. Term 1: File List (Claims 1, 6, 12, 15, 19, 20 and 21)**

Plaintiff's Construction	Defendant's Construction
<p>No construction necessary/plain and ordinary meaning</p> <p>Or in the alternative, “logic interface displayed on a client machine that allows a user to download from or upload files to a store on a network”</p>	<p>“a logic interface displayed on a client machine that allows a user to download or upload files to a store on a network, notifies users when files are available for download, and lists available files”</p>

**B. Term 2: Internal Mail (Claims 12 and 19)**

Plaintiff's Construction	Defendant's Construction
<p>No construction necessary/plain and ordinary meaning</p>	<p>“a private electronic communication system that uses only internal identifiers to deliver email and delivers email to users through a private server”</p>

Dated: September 10, 2021,

Respectfully submitted,

/s/ Thomas G. Fasone III

Thomas G. Fasone, III

Texas State Bar No. 0785382

tfasone@inventorsfirst.com

**Inventors First Law Group, PLLC**

2355 Thomas Ave, No. 2010

Dallas, Texas 75201

Telephone: (214) 402-5101

Raymond W. Mort, III

Texas State Bar No. 0791308

raymort@austinlaw.com

**THE MORT LAW FIRM, PLLC**

100 Congress Ave, Suite 2000

Austin, Texas 78701

Tel/Fax: (512) 865-7950

Dated: September 10, 2021,

Respectfully submitted,

By: /s/ Ryan J. Marton  
Darryl J. Adams (TX Bar No.  
00796101)  
dadams@sgbfirm.com  
SLAYDEN GRUBERT BEARD PLLC  
401 Congress Ave., Suite 1650  
Austin, TX 78701  
tel: 512.402.3550  
fax: 512.402.6865

Ryan Marton (admitted pro hac vice 223979)  
Carolyn Chang (admitted pro hac vice  
217933)  
Phillip Haack (admitted pro hac vice 262060)  
MARTON RIBERA SCHUMANN & CHANG  
LLP  
548 Market Street, Suite 36117  
San Francisco, CA 94104  
Telephone: (415) 360-2515  
Email: ryan@martonribera.com  
carolyn@martonribera.com  
phil@martonribera.com

Attorneys for Defendant Zoho Corporation